

Date: August 26, 1999

Dr. Elizabeth Yetley, Ph.D.

Center for Food Safety and Applied Nutrition, 1235 '99 SEP -7 P 1:45

Food and Drug Administration 200 c St. SW.,

Washington DC, 20204



Dear Dr. Yetley,

We sent you a letter on August 17, 1998 notifying you of our structure/function claims on our Earthrise® Spirulina Gold® dietary supplement labels. We are hereby notifying you that we recently revised these labels. There are no major changes.

Product Name: Spirulina Gold@ Tablets Size: 400

Spiruliua Gold@ Powder Size: 100g

Ingredient: Spirulii (Arthrospira) platensis

Structure Function Claims stated on all Spirulina Gold® labels:

- Supports a healthy immune system*.
- Contributes to healthy cholesterol levels*.
- Zinc is an essential mineral that plays a vital role in the body's enzyme system and promotes cellular health*.
- Spirulina has a high content of natural Beta Carotene in an antioxidant complex of mixed Carotenoids, synergistically promoting health at **multiple** sites in the body*.

*THESE STATEMENTS HAVE NOT BEEN EVALUATED BY THE FDA THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE, OR PREVENT ANY DISEASE.

Please inform me if other information or materials are needed. Thank you.

Sincerely,

Mr. Yoshimichi Ota

975 - N'1 sPresident

66991 LET 4199